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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

FINNMARK DESIGNS LLC, a Nevada  
Limited Liability Company,

Plaintiff,

v.

ROBYN OPENSHAW, an individual;  
GREENSMOOTHIEGIRL.COM, INC., a  
Utah Corporation, d/b/a INFL PRODUCTS;  
GREENSMOOTHIEGIRL.COM INC., a  
Florida Corporation;

Defendants.

**Case 2:23-cv-00018-JCM-VCF**

**STIPULATION AND ORDER TO  
PERMIT PLAINTIFF TO FILE A  
SUPPLEMENTAL COMPLAINT AND  
TO MODIFY DEFENDANT'S  
TIMELINE TO FILE RESPONSIVE  
PLEADINGS**

**(First Request)**

Pursuant to Fed. R. Civ. P. 6(b), 15(d) and Local Rule IA 6-1, all parties in the above-captioned matter hereby jointly stipulate that Plaintiff Finnmark Designs LLC shall have up to fourteen days to file and serve a supplemental pleading pursuant to Fed. R. Civ. P. 15(d). Further, the parties stipulate that Defendants shall have fourteen days after service of Plaintiff's supplemental pleading to file a responsive pleading to both the supplemental complaint and the original complaint filed in the Eighth Judicial District Court for Clark County Nevada on December 1, 2022, and which was removed to this Court on January 5, 2023 (ECF No. 1). The parties submit this stipulation Application on the following grounds:

1. In compliance with Local Rule 6-1, the parties hereto state as follows:

a. There have been no extensions sought by the parties and granted by the Court.

1           b. The reasons for this first request for an extension are as follows:

2           Plaintiff has recently discovered actions taken by Defendant after the filing date of  
3 Plaintiff's original complaint that it believes gives rise to additional claims for relief against  
4 Defendants. Plaintiff and Defendants agree that Plaintiff may raise any new claim(s) with respect  
5 to events that happened after the date of the original pleading in a supplemental pleading.  
6 Defendants have requested and Plaintiff has agreed that Defendant can respond to both the  
7 supplemental pleading and the original-filed complaint in one responsive pleading, which shall  
8 be filed within fourteen days of the service date of the supplemental pleading. This, in essence,  
9 extends the time for Defendants to file a response to the initial complaint as such response would  
10 otherwise be due by January 12, 2022, seven days after service of the notice of removal.  
11 Defendants have requested additional time as it is continuing to investigate and analyze potential  
12 defenses and counterclaims.

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The parties have also engaged in some settlement negotiations in the hopes of resolving this matter and they are continuing. Those negotiations have not yet resulted in any resolution.

DATED: January 11, 2023  
GILE LAW GROUP, LTD.

DATED: January 11, 2023  
KEVIN E. BECK, LTD.

By /s/ Ryan Gile  
Ryan Gile, Esq.  
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Attorneys for Plaintiff

By /s/ Kevin E. Beck  
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Attorney for Defendants

IT IS HEREBY ORDERED that supplemental complaint must be filed and served no later than January 31, 2023. If plaintiff does not file supplement complaint by this deadline, defendants responses to the original complaint will be due February 13, 2023.

**ORDER**

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED: 1-12-2023